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00475 RF 05

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2005 SEP 29 P 3: 29

Department of Energy

LETTER CORRESPONDENCE
CONTROL

**ROCKY FLATS PROJECT OFFICE
12101 AIRPORT WAY, UNIT A
BROOMFIELD, COLORADO 80021-2583**

SEP 28 2005

05-DOE-00580

[illegible]


**Mr. Carl Spreng
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530**

Dear Mr. Spreng:

Please find enclosed the additional information requested by Mr. David Kruchek, Colorado Department of Public Health and Environment, for the 440 Closure Project, Final Decommissioning Closeout Report, DWF-096-05. Also included is a copy of Attachment 3 and one additional figure that shows the rooms associated with 440.

Questions may be directed to Rich Schassburger, Rocky Flats Project Office, at (303) 966-4888.

Sincerely,


John J. Rampe, Director
RFPO Closure Project Management

Enclosure

cc w/o Encl.:

S. Nesta, K-H, RISS Env
J. Heber, K-H RISS D&D
K. Wiemelt, K-H RISS D&D

cc w/Encl.:

D. Kruchek, CDPHE
M. Aguilar, USEPA
D. Abelson, RFCLOG
K. Korkia, RFCAB
Administrative Record

Reviewed for Addressee
Comes. Control RFP

9/29/05

By

Ref. Ltr. #

05-BF-00874

DOE ORDER #

5400.1

ADMIN RECORD

IA-A-002788



September 20, 2005

05-RF-00874

Richard J. Schassburger, Director
Headquarters Cadre Project Management
DOE, RFPO

**TRANSMITTAL OF RESPONSE TO COLORADO DEPARTMENT OF HEALTH AND
ENVIRONMENT (CDPHE) COMMENTS OF DECOMMISSIONING CLOSEOUT REPORT FOR
THE 440 CLOSURE PROJECT -- DWF-096-05**

Enclosed are the responses to CDPHE comments on the Final Decommissioning Closeout Report for the 440 Closure Project, Type 2 Facility. Also included are five copies of Attachment 3, and one copy of one additional figure that show the rooms associated with 440.

Transmittal to the CDPHE and the Environmental Protection Agency, in accordance with the Rocky Flats Clean-Up Agreement, is requested.

If you have any questions, please contact Steve Nesta at extension 6386.

Dennis W. Ferrera
Vice President and Project Manager
Remediation, Industrial D&D, and Site Services

KLM:rlm

Enclosure:
As Stated

Original and 1 cc -- Richard J. Schassburger

cc:
John Rampe

SUMMARY OF B440 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

- 1) RCRA/TSCA Section, page 2 – Please change to state that the CSR for Unit 440.1 was approved by CDPHE on May 31, 2005. Also please include discussion of the Unit S002 Oil and/or Aqueous Solidification Treatment Process (call Harlen with questions).

RESPONSE:

The CDPHE approval date for the 440.1 CSR is changed to May 31, 2005.

As part of B440 operations, RCRA Permitted Treatment Unit S002, Oil and/or Aqueous Solidification Process, was operated in B440. Unit S002 was a Site treatment unit, first treating waste in B440 on 10/7/04. The unit treated hazardous waste packages containing free liquids generated from previous production buildings via solidification. On 12/2/04, a Closure Description Document (CDD) was submitted to CDPHE, describing the unit and its administrative closure. The CDD was approved on 12/23/04. A Closure Summary Report was submitted on 3/28/05, and acceptance of the unit closure from CDPHE was dated 4/15/05. This unit was closed prior to RISS assuming D&D activities in B440.

- 2) Introduction – Please modify the discussion to include the addition and purpose of the Eastside, as well as the differences in timing of the characterization and demolition of the two sections.

RESPONSE:

Paragraph 4 revised as follows: a TRU waste storage and shipping facility (a.k.a., East Side). Room 114 was a railcar bay. The railroad tracks, which were covered with poured concrete in the early 1990 is approximately 5 feet lower than the main building floor. Gantry cranes present in Rooms 105 and 114 were used to move equipment and materials used in the modification of safe secure transports. Industrial-sized paint booths were located in Rooms 113 and 123.

Building 440 was classified as a Type 2 facility primarily because of the C-Cell, repack glovebox, and glovebox ventilation system. However, it was agreed to in the concurrence letter for B440 east side that since results indicated that no radiological, beryllium, asbestos, or PCB contamination exists in excess of the PDSP unrestricted release limit in the Building 440 east side could be demolished prior to the west side. The B440 west side PDS was performed separately after the repack glovebox and ventilation systems were removed.

- 3) Section II, Utility Disconnect –

- a) Please expand this discussion to properly identify the isolation performed at the "two manholes". Also, the figure provided in Appendix 1 states that the sanitary sewer was plugged at manholes 46 and 47, and also states that the "Grease Trap" SW of B440 was removed. Since this trap appears to be attached to the sanitary sewer system, plugged at MH 46, this should be included in the discussion. In addition, please provide a discussion regarding the disposition of the storm drains associated with B440 (including the ones between the Eastside and the Westside, and running east west immediately south of B440).
- b) Beryllium – Please modify this discussion to properly state that Be sampling was conducted in both the East and West sides of B440, as provided in Appendix 3.

SUMMARY OF B440 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

RESPONSE:

- a) Paragraph 2 revised as follows: Potable water feed to the facility was discontinued and isolated greater than five feet deep. All sanitary fixtures were disconnected, and sewer lines were flushed with a volume of high-pressure water equal to approximately 10 times the volume of the pipe. Sewer lines were then air gapped and grouted at two manholes exterior to the facility at a minimum depth of four feet. Any manholes that were not removed were filled with concrete. A grease trap southwest of B440 was previously removed and the lines were grouted at a minimum depth of four feet. The storm drain between B440 Eastside and Westside was air gapped and grouted at both the north and south side of the building at a depth of 30 feet, and the storm drains running east/west along the south side of B440 were completely removed.
- b) Revise the Beryllium section as follows: Historical and process knowledge of B440 activities indicated that Beryllium was not used or stored in B440. Ninety-nine (99) Beryllium samples were collected throughout B440; no samples indicated the presence of Beryllium. An additional eighty-two (82) in-process Beryllium swipe samples were collected throughout B440; no samples indicated the presence of Beryllium.
- 4) Section IX - Please expand this discussion to properly address the condition of all remaining infrastructure, including the condition of the slab and the removed section for the railroad tracks and contamination, as well as the associated concrete and asphalt.

RESPONSE:

Revise Section IX as follows: Figure Attachment ## depicts the amount of slab removed and that which remains greater than four feet below grade. The portions that remain had holes punched in them on 10' centers for groundwater considerations. All of the slab surrounding the railroad tracks was removed and surveyed for release as sanitary waste. No other infrastructure remains at the B440 site.

- 5) Appendix 1, Article 2 –
 - a) Please provide a figure that shows the locations of the rooms and columns discussed in this report and on the figure.
 - b) It would also help if the figures provided (Appendix 1, articles 1 & 2) were properly identified. Currently neither of the figures is properly identified as article 1 or 2.
 - c) Please show the removed section of the slab removed because of the contamination, and the portion of the slab removed to expose and remove the railroad tracks.

RESPONSE:

- a) New figure Article 3 is attached that shows locations of rooms along with Article 2 showing columns.
 - b) Articles 1/2 have been labeled in the attached PDF file.
 - c) Article 2 has been updated to reflect that all concrete surrounding the railroad tracks was removed, no contamination was found during the demolition around the rails.
- 6) Appendix 2 – Why are only some Contact Records provided rather than a complete document record for B440? Should provide all records for B440, to include all CRs, RLCR, PDSR, Notifications, etc.

SUMMARY OF B440 CLOSEOUT REPORT RESPONSE TO COMMENTS TO CDPHE

RESPONSE:

B440 Contact Records and other requested document are attached.

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
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TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

<http://www.cdph.state.co.us>



Colorado Department
of Public Health
and Environment

June 9, 2005

Mr. John Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

RE: B440 Westside Facility Disposition RSOP Notification

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your June 7, 2005 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of Building 440 Westside. We hereby agree that Building 440 Westside may be demolished utilizing the Facility Disposition RSOP, with additional actions to protect, manage, and remove the remaining radiological contamination in B440 Westside as indicated.

Although your June 7, 2005 letter referred to the "Component Removal, Size Reduction and Decontamination Activities" RSOP, it is our understanding that this was intended to be the Notification for the Facility Disposition RSOP instead.

Since activities to be performed during the demolition of B440 Westside also include protection and disposition of remaining non-friable asbestos floor tile as well as potentially contaminated deeper (inside or under the slab) covered surfaces, we have agreed that these issues can be managed as discussed in a Contact Record dated June 9, 2005.

This and other issues that may arise during demolition activities may be resolved utilizing the consultative process, with resolutions captured in Contact Records, as well as in the Closeout Report for B440 (both East and West sides).

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Sam Garcia, EPA
Duane Parsons, KH
Administrative Records - Mountain View

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
J. Mike Swartz, KH

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Colorado Department
of Public Health
and Environment

June 9, 2005

Mr. John Rampe
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
12101 Airport Way, Unit A
Broomfield, CO 80021-2583

RE: Reconnaissance Level Characterization Report (RLCR)/Pre-Demolition Survey Report (PDSR) for Building 440 Westside – Concurrence & Approval

Dear Mr. Rampe:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR/PDSR for Building 440 Westside Closure Project; Revision 0 dated June 1, 2005. Revisions have been made based on comments provided. We received a copy of your letter regarding this RLCR/PDSR on June 7, 2005. Based on the information contained in this RLCR/PDSR, as revised, we are hereby concurring that Building 440 Westside is a Type 2 Facility. We are also approving the PDSR, as revised, for B440 Westside.

Although we are approving the PDSR for B440 Westside, it is recognized (as stated in the PDSR) that radiological contamination remains in B440 Westside. It is also our understanding that asbestos containing non-friable floor tile remains in B440 Westside. As such, we expect to receive specific work plans and/or a Facility Disposition RSOP Notification to properly identify the activities that will be implemented to demolish B440 Westside and to properly protect, manage, and/or remove and dispose of the contaminated portions of B440 Westside.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Sam Garcia, EPA
Duane Parsons, KH

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records – Mountain View

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Colorado Department
of Public Health
and Environment

May 31, 2005

Mr. John Rampe, Project Coordinator
U.S. Department of Energy, RFEO
10808 Highway 93, Unit A
Golden, CO 80403-8200

Mr. Stephen Nesta
Environmental Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B
Golden, CO 80403-8200

RE: Closure of RCRA Unit 440.1

Dear Mr. Rampe and Mr. Nesta:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received the subject report transmitted on May 24, 2005. The Division agrees that closure activities under Part X-Closure of the Site's State RCRA Permit, specifically permit number CO-04-06-23-01, effective July 23, 2004 were applicable. Further that the activities described in the Unit's Closure Description Document (CDD), approved by the Division on March 29, 2005, have been completed.

Specifically, we accept the Closure Summary Report, and professional engineer certification, for the rooms of RCRA Unit 440.1 located in Building 440. The Outside Staging Area for loaded TRUPACT-II vehicles, for which a viable potential for release did not exist, was administratively closed effective March 29, 2005 concurrent with the Division's approval of the Closure Description Document. If you have any questions concerning this correspondence, please contact me at 303-692-3367 or Harlen Ainscough at (303) 692-3337.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: M. Aguilar, USEPA Region VIII
D. Miller, AGO
Administrative Record, RFETS Bldg. T-130G

S. Garcia, City of Broomfield
Gary Morgan, DOE

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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(303) 692-3090



Colorado Department
of Public Health
and Environment

May 19, 2005

Mr. Joe Legare
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

Post-It* Fax Note	7671	Date	5/23	# of pages	3
To	Diane Parsons	From	D. Krueh		
Co./Dept.	KH	Co.	CDPHE		
Phone #		Phone #			
Fax #		Fax #			

RE: Building 440 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP) - concurrence

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has received your May 12, 2005 letter notifying us of your intent to utilize the Component RSOP for disconnection, removal, and packaging of equipment, and decontamination of building surfaces within B440. We are hereby concurring that this activity may proceed utilizing the Component RSOP.

It is also stated in your letter that you would like our concurrence with the six-point analysis. However, a six-point analysis was not provided, nor was there any indication for a need for the six-point analysis to have been provided with this Notification. Since it is stated that the proposed activity will not involve any breach or removal of contaminated portions of the building shell of B440, we see no need for a six-point analysis (per Component RSOP, Section 3.8.1) to be provided. However, if this or other proposed activity will breach the building shell, of B440 Westside, then a six-point analysis will need to be submitted.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Krueh at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Diane Parsons, KH
Sam Garcia, EPA

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Bensvento, Executive Director

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(303) 692-3090



Colorado Department
of Public Health
and Environment

May 19, 2005

Mr. Joe Legare
Director, Project Management Division
U.S. Department of Energy, Rocky Flats Project Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Report (RLCR)/Pre-Demolition Survey Report (PDSR) for Building 440 Eastside - Concurrence & Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR/PDSR for Building 440 Eastside Closure Project, Revision 0 dated May 12, 2005. Revisions have been made based on comments provided. We received a copy of your letter regarding this RLCR/PDSR on May 19, 2005. Based on the information contained in this RLCR/PDSR, as revised, and the RCRA Unit 440.1 closure documentation for Room 141 as provided, we are hereby concurring that Building 440 Eastside is a Type 2 Facility, as well as approving the PDSR for B440 Eastside.

Although we are concurring with the Type 2 designation for B440 Eastside, since no contamination was found and this section of B440 can be physically separated from the Westside of B440, we also agree that B440 Eastside may be demolished utilizing the Facility Disposition RSOP without submitting a demolition Notification or the 6 point analysis of the Component Removal RSOP Section 3.8.1, as long as the integrity of the building shell of B440 Westside is maintained. However, as a Type 2 Facility, a Closeout Report for B440, including the east and west sides must be submitted for our review and approval.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Krichak at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Gary Morgan, DOE
Mark Aguilar, EPA
Sam Garola, EPA
Duane Parsons, KH

Cameron Freiboth, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

-05 MON 07:28 AM DOE MAIL CENTER
15 07:40 FAX

FAX NO. 303 966 4019

P. 01

0002

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER 4700.1

05-RF-00470

DIST. LTR ENC

METER, T.J.

FERRERA, D.W. X

INDSAY, D.C.

ONG, J.

YLE, J.L.

MARTINEZ, L.A.

YZZUTO, V.M.

SHELTON, D.C.

SPEARS, M.S.

TUOR, N.R.

BEAN, C.

CLARK, D.

FREIBOTH, C. X X

GIBBS, F. X

GOLDEN, L. X X

HUMISTON, T.

JENKINS, T.

NESTA, S. X

PARSONS, D.

WIEMELT, K.

PRIMROSE, A. X

LINSINGLER, H.

SWARTZ, M.

CABLE, J.

NRINGER, R.

CORRES. CONTROL X X

ADMIN RECD/T130G X X

TRAFFIC

PATS#130

CLASSIFICATION:

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER

SIGNATURE:

Date:

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:

☐ PARTIAL OPEN

☐ CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:

DLP:pm

RF-46469 (Rev. 9/94)



KAISER-HILL
COMPANY

MAY 16 2005

Gary Morgan, Functional Lead
Cadre Project Management Division
DOE, RFPO

TRANSMITTAL OF THE BUILDING 440 EASTSIDE - RECONNAISSANCE LEVEL
CHARACTERIZATION REPORT/PRE-DEMOLITION SURVEY REPORT (RLCR/PDSR)
DWF-033-05

Provided for your review and approval is the enclosed subject report for the Building 440 Eastside. This report characterizes the physical, chemical and radiological hazards associated with this facility, summarizes the characterization activities, defines the Data Quality Objectives developed for this characterization, and presents the data quality assessment, verification and validation of results. Building 440 was an "anticipated" Type 2 RFCA facility prior to the performance of this RLC/PDS effort. A Type 2 RLC had not yet been performed in this building because the building had been in operation until recently, thus the majority of the building surfaces were inaccessible for characterization. Since the performance of this RLC/PDS effort was performed in accordance with the Pre-Demolition Survey Plan (MAN-127-PDSP), no further characterization of B440 Eastside is necessary.

Results indicate that no radiological, beryllium, asbestos or PCB contamination exists in excess of the PDSP unrestricted release limits in the Building 440 Eastside. Based on the analysis of radiological, chemical and physical hazards, Building 440 Eastside is classified as a RFCA Type 2 facility pursuant to the RFETS Decommissioning Program Plan (DPP; K-H, 1999) due to the radiologically contaminated equipment (i.e., the C-Cell, Repack glovebox, and glovebox ventilation system) in the West side of the facility. Building 440 Eastside can be demolished and the waste managed as sanitary waste. The Building 440 West side PDS will be performed after the Repack glovebox and ventilation system are removed, and will be documented in a standalone PDS report.

Please notify Kaiser-Hill when you transmit this document to CDPHE. If you have any questions, do not hesitate to call me or Duane Parsons at extension 6458.

Dennis W. Ferrera
Dennis W. Ferrera
Vice President and Project Manager
Remediation, Industrial D&D and Site Services

DLP:pm

Enclosure:
As Stated

Orig. and 1 cc - G. Morgan

Kaiser-Hill Company, L.L.C.
Rocky Flats Environmental Technology Site, 10808 Highway 93, Unit B, T130F, Golden, CO 80403-8200 • (303) 966-6458

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 6/9/05 – 1700

Site Contact(s): Duane Parsons (RISS) – (DAP-034)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 440 Westside Room 111 ACM Floor Tile and Room 114 Concrete Disposition.

Meeting Attendance

D. Kruchek, CDPHE

D. Parsons, K-H

Discussion

The Category 1 non-friable ACM floor tile and the slab in Building 440 Westside Room 111 is below three feet final land grade configuration. Therefore, the ACM floor tile in Room 111 will be left in place and covered with a minimum of three feet of clean soil. During the controlled building demolition, the ACM floor tile will be protected with a metal plate or dirt covering. Track vehicles will not be allowed to drive on the ACM floor tile during demolition. Care shall be taken during demolition debris removal in order to not disturb the ACM floor tile. After demolition is complete and prior to back-filling with clean soil, the metal plate covering (if used) will be removed.

Room 114 was a former railcar bay. In the early 1990's, the railcar tracks in Room 114 were covered with concrete; thus the original floor and railcar tracks were inaccessible for characterization during the RLC/PDS effort. Therefore, during controlled demolition of the concrete and slab in Room 114, these inaccessible areas (i.e., the original slab and railcar tracks) shall be further characterized prior to waste disposal determination. If the original floor or railroad tracks are found to be contaminated, then the concrete and railcar tracks will be removed and managed as LLW. If the concrete is not contaminated and this area of the slab is below three feet final land grade configuration, then this concrete can be left in place (the railcar tracks will be removed). A contact record of findings will be provided regarding this characterization, and discussed in the closeout report. This approach was discussed and concurred with by CDPHE, Dave Kruchek on June 9th, 2005.

Contact Record Prepared By: D. Parsons

Required Distribution:

J. Legare, DOE

C. Deck, K-H

D. Shelton, K-H

C. Gilbreath, K-H

S. Gunderson, CDPHE

L. Kilpatrick, K-H

R. Leitner, K-H

J. Mead, K-H

S. Nesta, K-H

K. North, K-H

T. Rehder, USEPA

Additional Distribution:

C. Freiboth, K-H

G. Morgan, DOE

D. Kruchek, CDPHE

M. Swartz, K-H

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 6/9/05 – 1200

Site Contact(s): Duane Parsons (RISS) – (DAP-034)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 440 Westside Room 111 ACM Floor Tile and Room 114 Concrete Disposition

Meeting Attendance

D. Kruchek, CDPHE D. Parsons, K-H

Discussion

The Category 1 non-friable ACM floor tile and the slab in Building 440 Westside Room 111 is below three feet final land grade configuration. Therefore, the ACM floor tile in Room 111 will be left in place and covered with a minimum of three feet of clean. During the controlled building demolition, the ACM floor tile will be protected with a plywood covering. After demolition is complete and prior to back-filling with clean soil, the plywood covering will be removed.

Room 114 was a former railcar bay. In the early 1990's, the railcar tracks in Room 114 were covered with concrete; thus the original floor and railcar tracks were inaccessible for characterization during the RLC/PDS effort. Therefore, during controlled demolition of the concrete and slab in Room 114, these inaccessible areas (i.e., the original slab and railcar tracks) shall be further characterized prior to waste disposal determination. If the original floor or railroad tracks are found to be contaminated, then the concrete and railcar tracks will be removed and managed as LLW. If the concrete is not contaminated and this area of the slab is below three feet final land grade configuration, then this concrete can be left in place (the railcar tracks will be removed). A contact record of findings will be provided regarding this characterization, and discussed in the closeout report. This approach was discussed and concurred with by CDPHE, Dave Kruchek on June 9th, 2005.

Contact Record Prepared By: D. Parsons

Required Distribution:

J. Legare, DOE

C. Deck, K-H

D. Shelton, K-H

C. Gilbreath, K-H

S. Gunderson, CDPHE

L. Kilpatrick, K-H

R. Leitner, K-H

J. Mead, K-H

S. Nesta, K-H

K. North, K-H

T. Rehder, USEPA

Additional Distribution:

C. Freiboth, K-H

G. Morgan, DOE

D. Kruchek, CDPHE

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 5/31/05 – 1300

Site Contact(s): J. Mike Swartz
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Removal of B440 HEPA exhaust plenum during demolition

Meeting Attendance

D. Kruchek, CDPHE

M. Swartz, K-H

Discussion

To enhance worker safety, the B440 HEPA exhaust plenum will remain in place until mechanical demolition of the building allows access to the unit for safe removal. The contaminated ductwork portions of the system have been removed and the plenum units filters have been sprayed with fixative and protective covers have been attached on both the intake and exhaust sides of the unit. Also as a precaution, a protective cover using scaffold and boards has been erected over the plenum unit. After the non-contaminated fans and exhaust stack is removed using a track hoe, the plenum unit will be removed and placed into the appropriate waste cargo container for disposal. Once the internally contaminated plenum is removed, demolition of the remaining structure will continue. On May 27, 2005, Mike Swartz discussed the above information with David Kruchek (CDPHE).

Contact Record Prepared By: J.M. Swartz

Required Distribution:

Additional Distribution:

16

J. Legare, DOE
C. Deck, K-H
D. Shelton, K-H
C. Gilbreath, K-H
S. Gunderson, CDPHE
L. Kilpatrick, K-H

R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
G. Morgan, DOE
T. Rehder, USEPA

M. Swartz, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Roberts, DOE

RFETS B440 Contact Records

Database Number: 1613

Date/Time: 11/4/04

Site Contact 1: Karen Lavorato

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Harlan Ainscough

Reg Contact 2:

Reg Phone:

Unit:

Building: 440

Purpose: Discuss the partial removal of B440 Staging Area

Discussion: The Site's Part B RCRA Permit, has special provisions for Container Staging Areas within a container storage unit. Unit 440.1 has a designated Staging Area approved for the staging of loaded TRUPAC II containers destined for WIPP. Due to the construction of the railroad tracks, a corner portion of the staging area will be removed and replace with tracks. The staging area is inspected weekly and complete documentation indicates that no releases or spills have occurred in this entire area. An administrative review results in no further action for the asphalt. A new boundary line will be painted when the construction is complete.

Harlan Ainscough concurred with the removal of asphalt.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1118

Date/Time: 4/1/04 10:30:00 AM

Site Contact 1: Greg Pudlik, x7698

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Harlen Ainscough, 303-692-3337

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: Approval of proposed sample location offsets for UBC440 (IHSS Group 400-2, #IA-04-01)

Discussion: Met with Mr. Harlen Ainscough at the Mountain View office to discuss proposed statistical sampling location offsets that will be required in Building 440. Building 440 is an active work center and currently handles drum staging and transuranic packaging for shipment to off-site disposal facilities. During the building walk-down performed on March 25, 2004 with building and field personnel, it was determined that approximately seven of the twelve statistical sample locations from the approved SAP Addendum for IHSS Group 400-2 would require offsetting in order to avoid various obstructions such as building walls, pillar footings, and active work areas. None of the locations will require significant offsetting (approximately 6-feet or less) and the changes do not affect the intended purpose of the sampling effort. Mr. Ainscough agreed that the offsets were appropriate and approved of the proposed relocations of sample ids BW34-002, BW34-006, BW34-007, BW34-009, BW34-005, BX34-006, and BX35-027. The sample offsets will be explained in the discrepancy table in the data summary or closeout report.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1032

Date/Time: 8/22/03 3:00:00 PM

Site Contact 1: Karen Lavorato

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone:

Unit:

Building: 750 Pad, B440

Purpose: Use of Treatment Unit S002

Discussion: Waste Operations (WO) is performing repack on the 750Pad (East and West Perma-cons) and B440 (Room 123A & B). As part of repack, WO will be removing or correcting non-conforming package configurations, such as the identification of free-liquids through Real-Time-Radiography. There are two categories of free liquids that need to be addressed during this operation; a) free liquid that has separated from the original waste matrix and b) containerized free liquid greater than 1 liter. WO has requested the use of Treatment Unit S002, Oil and/or Aqueous Solidification Process to treat the waste so that the waste is acceptable offsite shipment.

For liquids that have separated from its original matrix, sufficient amount of inert absorbent will be added to the container and manual mixing will be required to ensure the liquid is absorbed. The type and amount of absorbent will be based on the container's IDC and constituents codes listed in WEMS and the Waste/Residue Traveler.

For containerized free liquids greater than 1 liter, a fingerprint of the liquid will be taken at a minimum. Additional sampling for example, VOAs, Semi-VOAs, metals, gram per liter, beryllium and PCBs may be necessary depending on where the liquid was generated and how much information WO knows about the non-conformance. (For example the inside container may be labeled identifying the contents.) Once the analytical data is received, an appropriate absorbent will be added. The type of absorbent will be decided on a case by case evaluation depending upon analytical results. Because active mixing will also be required to ensure all the liquid is absorbed, Unit S002 needs to be requested.

In accordance with the Site Part B Permit, a seven-day notification is required to use Treatment Unit S002 for this activity. WO will modify the following procedures to define this process and include the safety controls necessary for

RFETS B440 Contact Records

active mixing of liquids with absorbents; PRO-1662, 750Pad Perma-con Operations, PRO-1691, 750Pad Perma-con East Repackaging Operations, and PRO-1358, Glovebox and C-Cell Waste Operations.

James Hindman agreed that the notification can be in the form of this contact record.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 980

Date/Time: 7/2/03 2:30:00 PM

Site Contact 1: D.A. Parsons

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Dave Kruckeck

Reg Contact 2:

Reg Phone:

Unit:

Building: 440

Purpose: Building 440 Anticipated Typing 2 Reconnaissance Level Characterization

Discussion: Meeting Attendance

D. Parsons, RISS

D. Kruckeck, CDPHE

C. Freiboth, RISS

K. Shuler, RISS

E. Bryson, RFFO

S. Tower, RFFO

H. Linsinbigler, RISS

Discussion

During the weekly RISS Area Status meeting held on Wednesday afternoon, 7/2/03, Duane Parsons (RISS) discussed the Building 440 Anticipated Typing 2 Reconnaissance Level Characterization (RLC). The historical and present use of the building was discussed, as was the various additions that have been added on to the building over time.

It was discussed that the primary reason that the building was classified as an "anticipated" Type 2 RFCA facility was due to the drum repack room and the Permacon in Room 113. The remaining portions of the facility are not expected to contain residual radioactive or chemical contamination on facility surfaces.

Based on the above information, it was agreed that a combination RLC and Pre-demolition Survey (PDS) would be performed after the drum repack equipment and the Permacon in Room 113 was stripped out, and the rest of the building was readied for PDS. It was also agreed that floor coatings would be evaluated for undercoating contamination in suspect areas during the Building 440 PDS.

Follow-Up:

Keywords:

22

RFETS B440 Contact Records

Database Number: 977

Date/Time: 5/21/03

Site Contact 1: Rob Garren

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Archie Crouse

Reg Contact 2:

Reg Phone:

Unit:

Building: 440

Purpose: Arch Crouse with CDPHE, APCD and Rob Garren with URS Group Air Quality Management, a subcontractor to K-H ESS, met with Building 440 environmental and building representatives on May 21, 2003. Field inspections of buildings and operations are part of the CDPHE surveillance program for the Rocky Flats Environmental Technology Site and are conducted annually.

Discussion: Building 440

Attendance: The group met with Building 440 environmental representatives Don Brown and Karen Lavorato and building representative Jeanne Poling.

Verification: Jeanne Poling briefed the group on current activities in the building and addressed building specific questions. Don Brown provided all information requested by the CDPHE representative. The CDPHE representative gathered information about waste shipment and repackaging activities occurring in the building.

Results: No deficiencies were identified.

Records Transmitted: HEPA filter testing data and waste shipment information.

Follow-Up: Air Quality Management personnel will coordinate with building representatives annual velocity flow profile testing.

Keywords:

RFETS B440 Contact Records

Database Number: 689

Date/Time: 6/3/02 3:30:00 PM

Site Contact 1: Karan North, x9876

Site Contact 2: Catherine Alstatt

Site Phone:

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone:

Unit:

Building: B374

Purpose: Management of waste associated with the B374 liquid operations

Discussion: I explained to James that although we had notified them in August 2001 that we would apply the newly agreed to waste codes to waste associated with Building 374 liquid operations within 15 days, we only applied them to the waste in Building 374. I explained that we have more of this type of waste throughout the site that we did not apply the codes within the 15 days.

Cathy explained that not all of the locations where the containerized waste is stored are currently permitted for the appropriate waste codes. James agreed that we could add the codes requested in the Class 2 permit modification for Part III of the permit to these units via a contact record. The authorized codes are D001-D043, F001-F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066-U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404. This approval will be in effect until the permit modification is approved..

UNITS 1, 10, 13, 14, 15, 18.03, 18.04, 20, 24, 59, 440.1, 460.1, 750.1, 984.1, 991.1.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 679

Date/Time: 5/15/02

Site Contact 1: Rob Garren, x2609

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Archie Crouse

Reg Contact 2:

Reg Phone:

Unit:

Building: 440

Purpose: Arch Crouse with CDPHE, APCD, Jon Dion with DOE, RFFO and Rob Garren with URS Group Air Quality Management, a subcontractor to K-H ESS, toured Building 440 with environmental and building representatives on May 15, 2002. Field inspections of buildings and operations are part of the CDPHE surveillance program for the Rocky Flats Environmental Technology Site and are conducted annually.

Discussion: Building 440:
Attendance: The group met with Material Stewardship environmental representatives Cathy Alstatt, Don Brown, and Valerie Thompson and Building 440 representative Kevin Stovall.

Verification: Don Brown and Kevin Stovall briefed the group on current activities in the building and addressed building specific questions. The CDPHE representative inquired about the mission of the building and gathered process data for activities occurring in the building. The group toured the new annex, the permacon used for headspace gas sampling, and the drum repackaging facility.

Results: No deficiencies were identified.

Records Transmitted: HEPA filter DOP testing data, process data and the Building 440 chemical usage report.

Follow-up required (list any documents requested): None

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 608

Date/Time: 4/11/02

Site Contact 1: Catherine Alstatt

Site Contact 2:

Site Phone: *3173

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: Staging of Loaded Transport Vehicles

Discussion: I contacted Mr. Hindman to discuss temporary staging of loaded transport vehicles in the 664/440 area. I explained to Mr. Hindman that due to the scheduled B886 D&D activities the weekend of April 12-15, an exclusion area has been created that includes the 690Yard which is currently used to stage transport vehicles. Mr. Hindman concurred that while the exclusion area is in place the 664/440 area can be used for vehicle staging.

Follow-Up:

Keywords:

25

RFETS B440 Contact Records

Database Number: 438

Date/Time: 12/19/00 3:30:00 PM

Site Contact 1: Jackie Berardini

Site Contact 2:

Site Phone: *2058

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: 1. Oasis Sludges; 2. 750 Pad Tank Coupons; 3. Drum crushing of lead-lined drums; 4. Permit Modification #00-09 (11/21/00) pertaining to Unit 15; 5. B440 activities; and, 6. POC Inspections.

Discussion: 1. Oasis Sludges. Ray provided information about treatment options for the 801 and 807 IDCs, as well as other STP/orphan sludges. Transportation issues and opportunities were also discussed. Status of inspections and overpacks was provided. Storage considerations were discussed to bridge the time until treatment/disposal can be accomplished. A written report will be provided to CDPHE, including engineering analysis of the issues raised in the 1998 LATA report. It was agreed that IDCs 822 (Combustibles -Wet Tru Waste) and 832 (Combustibles -Wet Tru Mixed Waste) are not deteriorating due to the same radiolytic corrosion mechanism affecting the other IDCs of concern; therefore, the previously agreed management of organic sludges does not apply to IDCs 822, 832.

The suspect Item Description Codes (IDCs) are now: 001 Aqueous Process Sludge

003 Organic Waste Immobilization

292 Incinerator Sludge

299 Miscellaneous Inorganic Sludge

340 Sludge from Size Reduction Area

800 Solidified Sludge / Aqueous Waste-Bldg 774

801 Solidified Organics -Bldg 774

802 Solidified Lab Waste -Bldg 774

803 Solidified Sludge -Bldg 374

807 Solidified Bypass Sludge -Bldg 374

The following IDCs have been eliminated from the "suspect" category:

822 Combustibles Wet Tru Waste

832 Combustibles Wet Tru Mixed Waste

RFETS B440 Contact Records

2. 750 Pad Tank Coupons. A copy of the independent engineering report prepared by Environmental Resources Management ("ERM"), "Tank Integrity Assessment of the High Density Polyethylene Tanks on the 750 Pad" dated December 12, 2000 was provided to Mr. Hindman. A brief discussion of the findings (tanks are fit for continued use) and recommendations was had. MS Environmental Management will draft a permit modification request for reinsertion of the remaining coupons and future integrity assessments in accordance with the ERM recommendations.

3. Drum crushing of lead-lined drums. A preliminary discussion of the requirements for this activity was conducted. Follow-up discussions will be necessary.

4. Permit Modification #00-09 (11/21/00) pertaining to Unit 15. Pre-existing clarifying language to the Unit Specific Conditions Sheet was mistakenly omitted from the modification; it was resubmitted.

5. B440 activities. For information only, status of the construction effort and projected completion date (September 2001) was provided. Likewise, the preliminary thinking was presented about using a portion of MS storage capacity (B440 or other location) for Standard Waste Box ("SWB") visual inspection & repack, and HeadSpace Gas Sampling.

6. POC Inspections. This subject is included here simply to complete the list of matters discussed. A separate contact record pertaining to this matter will be prepared.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 403

Date/Time: 11/15/00 8:00:00 AM

Site Contact 1: Jackie Berardini

Site Contact 2:

Site Phone: *2058

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: To provide additional information of IDC 801 (etc.) Drums

Discussion: A summary of the situation related to 55-gallon drums containing suspect mcs (001, 003,292,299,340,800,801,802,803,807,822,832) was provided to Mr. Hindman, including discovery of pinhole-breached drums in mid-October, follow-up investigations, interim management of these drums; and, long-term issues. The postulated chemical mechanism producing HCl-induced deterioration of the drums was discussed. The present status of enhanced visual in situ inspections and overpack activities in B. 440, the other Material Stewardship container storage areas, and sitewide was also presented. The workplan and schedule for resolving the issues was provided.

Based upon this discussion, it was detennined that:

1. No enforcement action will be taken in light of the self-disclosure and thorough response to the issues, provided that Kaiser-Hill continues to respond as described below.

2. A follow-up discussion will be auanged to discuss potential treatment options for this orphan waste stream and the safety concerns raised in the 1998 LATA memo, including consideration of an engineering analysis of container stacking; plans for segregation of these drums; and, whether age of the containers is a significant factor.

3. Interim responses will be taken, as follows:

a. enhanced visual in situ inspections of 100% of the drums containing the suspect IDCs (as listed above) will be perfonned, with this action being accorded high priority on a sitewide basis;

Contact Record November 21, 2000 Rev. 11/15/00

b. Drums identified as potentially breached or with compromised integrity

RFETS B440 Contact Records

("suspicious") will be further inspected visually and/or Ultrasound Tested. These drums will be removed from the stacks, if applicable, to perform this inspection. Based upon this second inspection, confirmation of the integrity of drums or the determination to overpack to address breach or imminent breach will be made.

c. The pennit currently recites that

"Containers of hazardous and mixed waste will be maintained in good condition. If a container is not in good condition, (e.g., has severe rusting, structural defects compromising the integrity of the container, or begins to leak), the Permittee will immediately (i.e., within 24 hours) place the container in a pan or overpack or otherwise isolate the container. The Permittee will then transfer the waste to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit."

For the purpose of meeting the permit requirement to take action "immediately" as quoted above, if the drum contents are actively leaking or radiation contamination has been detected at the area of concern, then the integrity of the container must be considered compromised and the container must be placed in a pan or overpacked or otherwise isolated within 24 hours.

As to drums that are not actively leaking and for which radiation contamination has not been detected at the area of concern but which are pinhole-breached, the term "immediately" will be taken to mean "as soon as practicable" but not more than 21 calendar days.

d. Material Stewardship drums containing suspect mc waste materials should be segregated to the extent practical to facilitate enhanced inspection. Segregation can occur in the due course of routine business, as stacks/pallets are broken down for other reasons unrelated to this mc concern. Good faith efforts to perform the segregation will be made by all Projects.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 223

Date/Time: 10/26/00 9:30:00 AM

Site Contact 1: Catherine Alstatt

Site Contact 2:

Site Phone: *3173

Agency: CDPHE

Reg Contact 1: Cindy Burbach

Reg Contact 2:

Reg Phone: 3036923315

Unit:

Building: B440

Purpose: Provide Information Relating to Drum Integrity Issues in Building 440

Discussion: I spoke with Ms. Burbach concerning a number of containers that have been identified in Building 440 that have integrity issues including corrosion and pinholes. I explained to her that one container was identified with corrosion and pinholes in the lid on Friday, last week and several additional drums have been identified with similar integrity issues this week, all with the same waste type, organic sludge, IDC 801 (~9-10 total to date). I informed her that the following actions have been taken to date: any container that has integrity issues will be overpacked; samples of the corrosion were taken yesterday (October 24, 2000) to be analyzed to provide information on the mechanism that is causing the corrosion; and an evaluation is being made about whether to move one of the containers to Building 776 where it could be opened and visually inspected. I explained to her that a full evaluation of the issue is currently being made. Once that evaluation is completed any necessary corrective actions will be developed and implemented. Ms. Burbach asked about the compatibility of the waste with the container. I informed her that this would be included in the evaluation. Ms. Burbach asked to be kept informed of the issue and any corrective actions that are developed.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 222

Date/Time: 10/4/00 9:50:00 AM

Site Contact 1: Catherine Alstatt

Site Contact 2:

Site Phone: *3173

Agency: CDPHE

Reg Contact 1: Cindy Burbach

Reg Contact 2:

Reg Phone: 3036923315

Unit:

Building: B440

Purpose: B440 Drum Filter Issues

Discussion: I contacted Cynthia Burbach today and informed her of four drums located in Building 440, three of which filter tested with low-flow and one with a high-flow. I explained to her that the building still has operations terminated and that a start up plan has been developed which details how these drums will be managed until the filters can be replaced.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 128

Date/Time: 8/14/00 1:00:00 PM

Site Contact 1: Wayne Moe

Site Contact 2:

Site Phone: *4808

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone: 3036923345

Unit:

Building: B440

Purpose: Change in B440 HSGS Location and Update on B440 Safety Concern (Pallets)

Discussion: HSGS:
Paragraph #3, Page III-72 of the RCRA permit states that Rm 113 (in B440) will be used for headspace gas sampling (HSGS) and analysis. I advised Mr. Hindman that the location of the B440 HSGS was no longer to be Rm 113 and, since Rm 113 was explicitly identified in the permit, requested permission to place the HSGS apparatus in a yet undetermined location in B440 (but within the permitted area). It was noted that HSGS is normally not a permitted activity and that the condition referencing HSGS would be deleted in the next Class 1 permit modification. Mr. Hindman agreed to the location change and that the permit should be "cleaned up" with the next permit modification. An approved HSGS procedure is still to be provided to the Division 30 days prior to initiation of operations (as currently required by the permit).

B440 Safety Concern (Pallets)

I advised Mr. Hindman that a Safety Alert had been issued on 8/10/00 concerning deformation of certain pallet types in stacks of B440 mixed waste drums. Contrary to an initial determination, the issue is not now considered an emergency situation and corrective measures were being developed that will result in appropriate restack the affected containers. Mr. Hindman acknowledged the situation and requested a copy of the Safety Alert - I delivered a copy to his desk in T124A on 8/15/00.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 103

Date/Time: 7/13/00 10:20:00 AM

Site Contact 1: Wayne Moe

Site Contact 2: Catherine Alstatt

Site Phone: *4808

Agency: CDPHE

Reg Contact 1: James Hindman

Reg Contact 2:

Reg Phone: 3036923345

Unit: 20

Building: B664

Purpose: Modified RCRA Inspections for B664 Carousels

Discussion: The B664 High Bay is used for the preparation of 14 drum "carousels" that are placed into TRUPAC II vessels for shipment to WIPP. A carousel consists of two tightly bound and stacked circular planar arrays of 7 drums; the innermost drum of the array cannot be accessed without first removing outer drums. The High Bay has been permitted under RCRA (Unit 20) for storage of TRUM wastes. A planned acceleration to TRU/TRUM waste shipment schedule will require the construction of carousels in advance of actual placement and shipment within TRUPAC II vessels. The present Unit 20 RCRA permit does not address carousel container configurations. Mr. Hindman was asked if deviations to weekly RCRA inspection and locator system requirements would be possible for TRU/TRUM carousels in the B664 High Bay that could not be shipped for 30 days or more.

Mr. Hindman indicated that a recent RCRA permit modification (#00-01, April 17, 2000) allowed variance to many RCRA conditions for up to 60 days on TRUPAC II carousels in Unit 440.1. If the Unit 440.1 unit specific conditions would be acceptable for use in Unit 20, a Class 1 permit modification should be initiated to adopt these conditions.

Mr. Hindman was then told that a Class 1 modification similar to Unit 440.1 conditions would be immediately initiated for Unit 20. Further discussions with CDPHE were recommended if Unit 20 requires more leniency than those provided to Unit 440.1.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 349

Date/Time: 6/14/00

Site Contact 1: Mike Putney

Site Contact 2:

Site Phone: *2692

Agency: CDPHE

Reg Contact 1: Archie Crouse

Reg Contact 2:

Reg Phone:

Unit:

Building: 440, 881

Purpose: Arch Crouse with the CDPHE, APCD, and Mike Putney with Radian Air Quality Management (AQM), a subcontractor to K-H ESS, inspected Buildings 440 and 881 with building representatives on June 13, 2000. Field inspections of buildings and operations are part of the CDPHE surveillance program for the Rocky Flats Environmental Technology Site and are conducted annually.

Discussion: Building 865, 883 and 886.
Attendance: The group met with building representatives Cleve Tuck and Rob Early (RMRS), and environmental representative Cathy Alstaff (Energx).

Verification: Rob Early and Cleve Tuck provided information regarding calendar year 1999 activities and current activities in the building and addressed building specific questions regarding current and future plans. The CDPHE inspector did not physically tour the building.

Results: No deficiencies were identified.

Records Transmitted: Building personnel transmitted drum repack records, chemical usage records, and HEPA filter pressure drop SOE round sheet.

Follow-up required (list any documents requested): None

Building 881

Attendance: The group met with building environmental representatives Chuck Albin (RFCSS).

Verification: Chuck Albin provided information regarding calendar year 1999 activities and current activities in the building and addressed building specific questions regarding current and future deactivation and decommissioning plans. The CDPHE inspector did not physically tour the building.

Results: No deficiencies were identified.

RFETS B440 Contact Records

Records Transmitted: Chuck Albin transmitted aerosol can puncturing unit records to the CDPHE inspector, Mike Putney transmitted the most recent emergency generator hour meter monthly compliance record readings for the Building 881 emergency generators, and freon usage information for the building's registered chillers to the CDPHE inspector.

Follow-up required (list any documents requested): None

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 290

Date/Time: 6/21/99

Site Contact 1: Tom Kalivas

Site Contact 2: Veronica Orozco

Site Phone: *2884

Agency: CDPHE

Reg Contact 1: Dick Fox

Reg Contact 2:

Reg Phone: 3039662793

Unit:

Building:

Purpose: Dick Fox with the CDPHE, APCD, and Tom Kalivas with Radian Air Quality Management, a subcontractor to Kaiser-Hill, toured buildings 440, 664 and 881 with RMRS representatives on June 16, 1999. Field inspections of buildings and operations are part of the CDPHE surveillance program for the Rocky Flats Environmental Technology site and are conducted annually.

Discussion: Building 440 (RMRS)
Attendance: The group met with RMRS environmental representative Veronica Orozco and Building 440 representatives Rob Earley (RMRS) and Mark Dagostino (RMRS).

Verification: Rob Earley and Mark Dagostino addressed building specific questions regarding the status of past and present building activities, including: The repackaging of low level waste drums in preparation for shipment to the Waste Isolation Pilot Project (WIPP). The CDPHE representative inspected the waste drum repackaging area, the new shrouded probe installation, and recorded the pressure drop readings from the HEPA filter plenum.

Results: No deficiencies were identified.

Records Transmitted: None

Follow-up required: None

Building 664 (RMRS)

Attendance: The group met with RMRS environmental representative Veronica Orozco and RMRS Building 664 representative Mary Durcholz.

Verification: Mary Durcholz addressed building specific questions regarding the status of drum testing and the loading of waste drums into Trupact II containers, and chemical usage (paint and chalking).

RFETS B440 Contact Records

Results: No deficiencies were identified.

Records Transmitted: None

Follow-up required: None

Building 881 (RMRS)

Attendance: The group met with RMRS environmental representative Veronica Orzco and RMRS Building 881 representative John Suder, Ken Fry, Kim Orman and Rick Daley.

Verification: John Suder addressed building specific questions regarding the status of pressurized can puncturing, and laboratory chemical usage. CDPHE representative recorded hour meter readings from the Building 881 emergency generators, checked all three registered refrigeration systems, and recorded pressure drop readings from the four HEPA filter plenums.

Results: No deficiencies were identified.

Records Transmitted: None

Follow-up required (list any documents requested): None

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 422

Date/Time: 5/13/98

Site Contact 1: Mike Putney

Site Contact 2:

Site Phone: *2692

Agency: CDPHE

Reg Contact 1: Dick Fox

Reg Contact 2:

Reg Phone:

Unit:

Building: 440, 664, 881

Purpose: Richard Fox with CDPHE, APCD, Veronica Orozco with RMRS Environmental, and Mike Putney with Radian Air Quality Management, a subcontractor to Kaiser-Hill, toured Buildings 440, 664, and 881 on May 13, 1998. Air quality compliance field inspections of buildings and operations are part of the CDPHE surveillance program for the Rocky Rats Environmental Technology Site and are conducted annually.

Discussion: Building 440
Attendance: The group met with RMRS building representative Rob Earley
Verification: Rob Earley conducted a general tour of the building, and answered questions from the CDPHE representative. The Room 113 paintbooth has been stripped out and may be used for storage and sampling. The Room 123 paintbooth has just begun the demolition phase, and will be converted to a waste repackaging facility.
Results: No deficiencies were identified.

Records Transmitted: None

Follow-up required (list any documents requested): None

Building 440
Attendance: The group met with RMRS building representative Rob Earley
Verification: Rob Earley conducted a general tour of the building, and answered questions from the CDPHE representative.
Results: No deficiencies were identified.

Records Transmitted: None

Follow-up required (list any documents requested): None

RFETS B440 Contact Records

Building 664

Attendance: The group met with RMRS building representatives Henrick Padron, Chuck Albin, and Dennis Mauser

last year. Equipment from the building is being moved out. The paint can puncturing facility punctured about 2,500 cans last year. CDPHE representative recorded hour meter readings from the registered chillers and ensured that registration stickers and usage logs were in place. CDPHE representative recorded pressure drop readings from exhaust air HEPA filter stages.
Results: No deficiencies were identified.

Records Transmitted: 1997 Freon usage logs.

Follow-up required (list any documents requested): None

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1313

Date/Time: 5/14/97

Site Contact 1: Mike Putney

Site Contact 2: Gary Konwinski

Site Phone:

Agency: CDPHE APCD

Reg Contact 1: Richard Fox

Reg Contact 2:

Reg Phone:

Unit:

Building: 440, 664, 442

Purpose: Richard Fox with CDPHE, APCD, Ed Kray with CDPHE, Gary Konwinski with RMRS and Mike Putney with Radian Air Quality Management, a subcontractor to K-H, toured Buildings 440, 664 and 442 on May 14, 1997. Air compliance tours of Site buildings and operations are part of the CDPHE surveillance Program for the Rocky Flats Environmental Technology Site and are conducted annually.

Discussion: Buildings 440

Attendance: The group met with Building 440 representative Mitch Thornton (RMRS).

Verification: Mitch Thornton briefed the group on the status of future operations in Building 440. There is a possibility that the repack area will not be utilized in Building 440. A decision should be made by December of this year. Mitch Thornton conducted a general tour of the facility and explained planned uses for each room in the building.

Results: No deficiencies were identified.

Follow-up required (list any documents requested): None

Building 664

Attendance: The group met with Building 664 representative David Losasso (RMRS).

Verification: David Losasso conducted a quick walk-through of the facility. Mr. Fox asked if there was any change in chemical usage from the previous year. David Losasso said that spray paint is no longer used to mark the drums and touch-up the drums, that plastic labels are being utilized. Mr. Fox asked about the paint booth that was formerly in Building 664. David Losasso told him that

RFETS B440 Contact Records

the paint booth is in storage and will not be used in Building 664.

Results: No deficiencies were identified.

Follow-up required (list any documents requested):

Building 442

Attendance: The group went to Building 442 to verify that filter testing is no longer being performed at the facility.

Verification: Gary Konwinski told Mr. Fox that the filter testing formerly done in Building 442 is now being performed off-site. The building was not operational, and it appeared that equipment was being removed from the facility.

Results: No deficiencies were identified.

Follow-up required (list any documents requested): Mr. Fox asked for the date that the facility was closed down, and for chemical usage and number of filters tested in 1996. Gary Konwinski will provide the requested information.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 929

Date/Time: 4/14/97

Site Contact 1: Mike Putney

Site Contact 2: Gary Konwinski

Site Phone:

Agency: CDPHE

Reg Contact 1: Richard Fox

Reg Contact 2:

Reg Phone:

Unit:

Building: 440, 664, 442

Purpose: Richard Fox with CDPHE, APCD, Ed Kray with CDPHE, Gary Konwinski with RMRS, and Mike Putney with Air Quality Management/Radian Corporation toured Buildings, 440, 664 and 442, May 14, 1997. Air compliance tours of site buildings and operations are part of the CDPHE surveillance program for the Rocky Flats Environmental Technology Site and are conducted annually.

Discussion: Building 440:
Attendance: The group met with Building 440 representative Mitch Thornton (RMRS).

Verification: Mitch Thornton briefed the group on the status of future operations in Building 440. There is a possibility that the repack area will not be utilized in Building 440. A decision should be made by December of this year. Mitch Thornton conducted a general tour of the facility and explained planned uses for each room in the building.

Results: No deficiencies were identified.

Follow-up requested: None

Building 664:

Attendance: The group met with Building 664 representative David Losasso (RMRS).

Verification: David Lasasso conducted a quick walk-through the facility. Mr. Fox asked if there was any change in chemical usage from the previous year. David Losasso said that spray paint is no longer used to mark the drums and touch-up the drums, that plastic labels are being utilized. Mr. Fox asked about the paint booth that was formerly in Building 664. David Lasasso told him the paint booth is in storage and will not be used in Building 664.

Results: No deficiencies were identified.

RFETS B440 Contact Records

Follow-up requested: None

Building 442:

Attendance: The group went to Building 442 to verify that filter testing is no longer being performed at the facility.

Verification: Gary Konwinski told Mr. Fox that the filter testing formerly done in Building 442 is now being performed off-site. The building was not operational, and it appeared that equipment was being removed from the facility.

Results: No deficiencies were identified.

Follow-up required: None

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1155

Date/Time: 4/18/96

Site Contact 1: Bob Morgan

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Chris Gilbreath

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: I briefed Chris on the basic approach being taken by Gary Potter. In identifying additional storage for TRU waste, including mixed, to alleviate current near capacity conditions as committed at the Residue Manager's meeting on 4/3/96. At this meeting the state had questioned where we would store the additional 7000 drums of Waste expected to be generated during solid residue treatment and repackaging. Chris was provided a copy of the attached MTF Chris acknowledged the preliminary information (Gary Potter will provide a formal briefing to the next Residue Manager's Meeting) and asked us to expand on the below topics:

- any preliminary cost data to ready specific facilities and move waste into them
- status of Type B Container equivalency evaluation for the pipe component
- finality of a SURB decision to use any given facility for waste storage

I queried Chris on his understanding of the MOU between DNFSB, EPA, DOE & CDPHE governing DOE activities in the RFETS Industrial Area and was surprised to hear that he felt the line DNFSB did not have concurrent authority with the State for mixed residues and TRUM. Since neither of us used the actual MOU document as a reference during this conversation there is room for misunderstanding, but I received the clear impression that the state did not expect Board interference with "waste" and they consider residues to be waste.

Discussion: Kaiser-Hill Interoffice Memorandum DRAFT

4/17/96

TO: File

FROM: R.V. Morgan

SUBJECT: Waste Storage Area Identification Project

Subject project is working to identify solutions to accommodate the growth of TRU waste including mixed IDCs, attendant to the treatment and repackaging of solid residues in the Residue Elimination Program (REP). Currently, most

RFETS B440 Contact Records

authorized storage areas are at or near capacity, creating inefficiencies and difficulties with overall site waste operations.

Project Tasks:

- Identify and frame the uncertainties associated with various storage options including;
 - use of unmitigated facilities, either new or existing
 - qualification of the pipe component for equivalency as a type B container
 - requirement for seismically qualified storage
 - requirement for "hardened" storage facilities, either new or existing
 - relief from current 10 Kg Pu load limit in unmitigated facilities
- Determine the sequencing and timing of decisions required to support REP milestones
- Identify the consequences of the decisions relative to RFETS programmatic; investigate default positions
- Decide on scheduling priorities and reduce barriers to schedule implementation

Potential unmitigated facilities: B664, B906, B440, B551, others

Potential hardened facilities: B371, B374, B707, B881, B991 (seismic too)

Unmitigated = non-hardened, unfiltered ventilation type (664/906)

- Near term relief is anticipated with Authorization Basis Group ruling due the week of 4/29/96 that unmitigated facilities are "authorizable" for storage >10 kg Pu up to 35-50 kg/1000 ft2. Subsequent step would seek SURB approval to turn specific facilities over to the waste storage function.
- Permit modifications as required for storage of hazardous waste will be submitted as a part of the specific facility preparations.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1520

Date/Time: 10/21/93 1:00:00 PM

Site Contact 1: John Leifer, x3751

Site Contact 2:

Site Phone:

Agency: CDPHE

Reg Contact 1: Cathy Alstatt

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose: Informal meeting called by John Leifer to discuss compliance issues.

Discussion: Listed below are compliance issues raised by CDH. For resolution or RFO comments see [brackets]. Comments or status reported as of 11/1/93. For RFO lead person is listed.

1. Plant wide excess chemical roundup problems – CDH questions RFP's ability to promptly make waste determination and characterization (the latter based on the long sampling and inside lab turn around times); and to properly manage and store the wastes (based on problems experienced in B559 and B993, and elsewhere). {Meeting was held with CDH on 10/22 by EG&G. CDH requested periodic updates in the 11/1/93 bi-weekly meetings} Lead person Grosek.
2. CDH enforcement is questioning whether the stabilization of reactive wastes (as in the B993 scenario) requires an emergency treatment permit. This rationale needs to be explained by EG&G and CDH enforcement needs to check the issue with their permit staff. {EG&G said permit is not required & provided rationale in the 10/22 meeting. CDH to check with their permitting people} Lead person Mauer.
3. CDH needs to be briefed on the residue drum integrity problems that are described in the "Connors Report" (Connected with the DNFSB issue). {CDH attended the briefing provided to DNFSB. Do not see an immediate problem, but may add some permit conditions as compensatory measures. Lead person Mauer.
4. Excavated soils in IHSSs – the old, not "recurring" CDH issue of waste determination, characterization, and management of soils excavated in IHSS's, which may be hazardous waste). {This issue has festered into a major problem with DEH. RFO and EG&G Management needs to get involved!} Lead person Lukow, Schassburger, Wienand)
5. Status of Aerosol cans stored in the bunker area, near B993. {EG&G Ops reports the cans are either empty or are product and have been determined to not be waste. As a result, it is presently not an issue with CDH.}
6. B440 RCRA wastes were placed in plastic bags to "cure" – evidently there was

RFETS B440 Contact Records

an occurrence report on this. {Later check by WPB revealed these may have been excess chemicals – mixed together to insulate a trailer. Story does not make sense! Will review occurrence report.) Lead person Leifer, NMD)

7. December 10 – Pilot Building (559 & 460) compliance status meeting with CDH (Re-scheduled to 12/13-14, Gerdeman raised the issue of whether RFO should have a preview meeting, because of assertions EG&G may make regarding compliance.) Lead person OD, NMD, Gerdeman, Leifer.

8. Inquired about the status of the EG&G internal MOU regarding operations and support functions. {RFO reported it has reviewed the MOU and found it to be deficient. RFO will provide comments to EG&G. The ECTT task force does not plan to commit any additional effort toward resolving problems with the EG&G MOU.} Lead person Leifer

9. CDH repeated the issues with B993 illegal storage; waste determination and characterization; maybe storage of incompatibles. Larger issues are – how will the plant be able to manage the excess chemical program with regard to storage capacity and waste characterization? {Issues were discussed in EG&G's 10/22 meeting with CDH. Action plan is being followed by CDH through the biweekly meetings and through the Potter contacts.} Lead person Leifer will follow via the EG&G-Ops contacts.

10. Waste characterization issue regarding closure performance standards for B528 90-day tanks. Evidently Waste Programs (WIC) called for 20 parameters to be used for performance standards, but operations, on checking the tanks' history determined that only 4 parameters were necessary. May be a case of overly conservative advice from the EG&G Waste Programs organizations. {This is a new issue which may need follow-up by an RFO program manager. Suggest Randy Walker be contacted for more background.} Lead person Doyle.

11. CDH is still not satisfied with certain aspects of the RCRA Training Program. CDH will discuss details at a later time. {More to come, later.} Lead person Grosek.

12. During a visit to B776 CDH discovered a leak through a ceiling to the floor of a residue storage area. The EC indicated it is water from a fire suppression system. {R. Walker confirmed it is a small water leak from a fire system, and an IWCP is being prepared to fix it. Evidently it is a concern with CDH because this is one of the areas covered by the residue permit modification.} Lead person OD-Hicks.

Follow-Up:

Keywords:

RFETS B440 Contact Records

Database Number: 1869

Date/Time:

Site Contact 1:

Site Contact 2:

Site Phone:

Agency:

Reg Contact 1:

Reg Contact 2:

Reg Phone:

Unit:

Building:

Purpose:

Discussion: ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 5/31/05 -- 1300

Site Contact(s): J. Mike Swartz
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Removal of B440 HEPA exhaust plenum during demolition

Meeting Attendance

D. Kruchek, CDPHE M. Swartz, K-H

Discussion

To enhance worker safety, the B440 HEPA exhaust plenum will remain in place until mechanical demolition of the building allows access to the unit for safe removal. The contaminated ductwork portions of the system have been removed

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and the plenum units filters have been sprayed with fixative and protective covers have been attached on both the intake and exhaust sides of the unit. Also as a precaution, a protective cover using scaffold and boards has been erected over the plenum unit. After the non-contaminated fans and exhaust stack is removed using a track hoe, the plenum unit will be removed and placed into the appropriate waste cargo container for disposal. Once the internally contaminated plenum is removed, demolition of the remaining structure will continue. On May 27, 2005, Mike Swartz discussed the above information with David Kruchek (CDPHE).

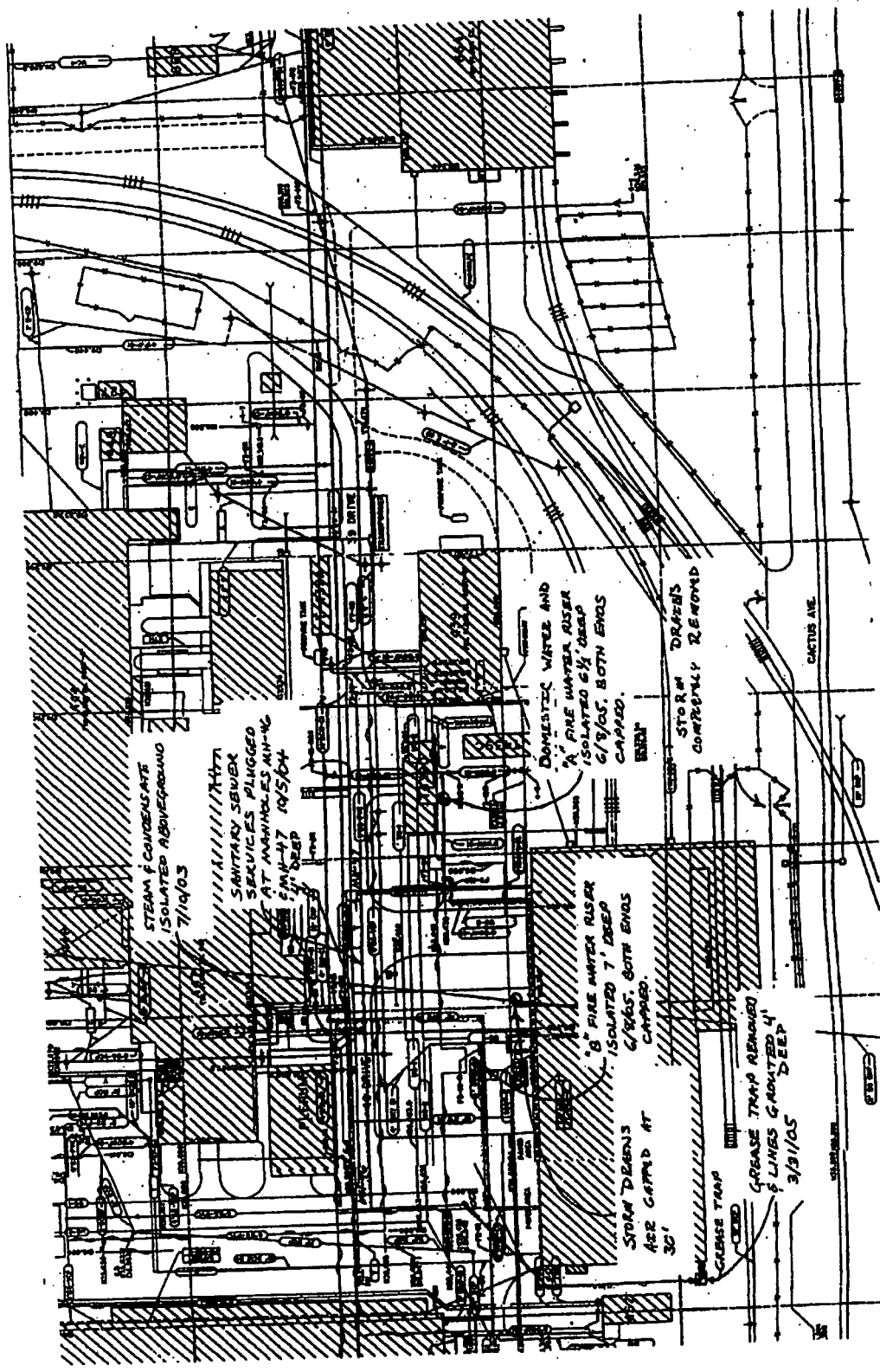
Contact Record Prepared By: J.M. Swartz

Required Distribution: Additional Distribution:

J. Legare, DOE R. Leitner, K-H M. Swartz, K-H
C. Deck, K-H J. Mead, K-H F. Gibbs, K-H
D. Shelton, K-H S. Nesta, K-H D. Kruchek, CDPHE
C. Gilbreath, K-H G. Morgan, DOE S. Roberts, DOE
S. Gunderson, CDPHE T. Rehder, USEPA
L. Kilpatrick, K-H

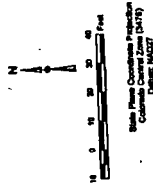
Follow-Up:

Keywords:




Attachment 1 - B440 Utilities Disconnects

Standard Map Features



U.S. Department of Energy
Rocky Flats Environmental Technology Site

Prepared By: **CH2MHILL**

 215 DEPT. (303) 968-7707

DATE: 9/19/2005

ATTACHMENT 3

